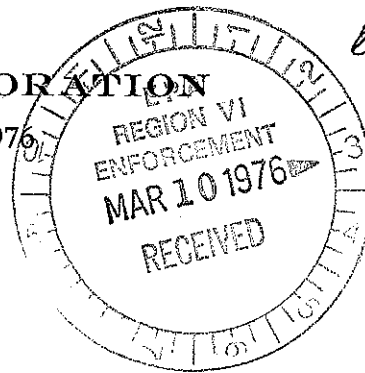


ETHYL CORPORATION

March 4, 1976



ETHYL TOWER
451 FLORIDA
BATON ROUGE, LA. 70801

Mr. John C. White
Regional Administrator
Environmental Protection Agency
1600 Patterson Street- Suite 1100
Dallas, Texas 75201

Ref. Ocean Dumping Permit 730D009C
General Condition No. 11

Dear Mr. White:

Pursuant to instructions in Permit 730D009C this is to report the information as required in General Condition No. 11 thereof concerning dumpings that were initiated during the period beginning September 2, 1975 through February 29, 1976.

11a Information in the records to be kept pursuant to Paragraph 10 of the General Conditions.

10a The material is a waste sodium-calcium sludge, a mixture of solid metallic sodium, metallic calcium and oxides of these metals plus sodium and calcium chlorides. Sodium chloride is used as fill material added first to the bottom of the containing 55 gallon drum before the addition of the waste sodium calcium sludge and then to the top. The sodium chloride fills the void spaces and provides added weight to ensure sinking the drum. Analyses are listed in Exhibit A attached.

10b The precise times and locations of dumping are listed in the attached Exhibit B, Paragraph 7b.

10c We have no reports of any undesirable effect on the marine environment or human health or welfare in connection with the permitted dumping activities.

11b A summary of the reports required by Paragraph 7 of the General Conditions is given in Exhibit B.

11c We have no additional reports or records, covered in Special Conditions of this Permit, to submit.

Mr. John C. White
March 4, 1976
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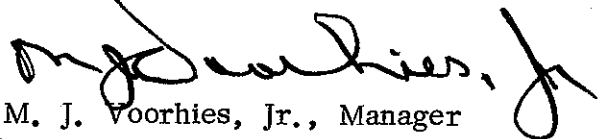
11d A composite sample representative of the barging operations carried out under this Permit for the period September 2, 1975 ending February 29, 1976 has been analyzed in Ethyl's Chemical Research Laboratory for the parameters required as follows:

Trace Metal Content of Sodium-Calcium Waste (Composite Sample)
(all analyses reported as mg/kg)

<u>Component</u>	<u>Limits of Detection</u>	<u>Analysis mg/kg</u>
Selenium	0.8	N.D.*
Arsenic	0.1	N.D.*
Beryllium	0.2	N.D.*
Vanadium	0.2	N.D.*
Nickel	0.2	0.6
Chromium		N.D.*
Zinc		8.1
Lead		3.4
Copper		2.9

* Below detectable level

Very truly yours,



M. J. Voorhies, Jr., Manager
Production Scheduling and Distribution

GEO:sak
Attach.

CC: Mr. T. C. Coerver
Mr. J. H. Huguet

EXHIBIT A

Chemical Analysis of the Material Dumped

Trip No.	No. 4	No. 5	No. 6	No. 7
Permit No.	730D009C	730D009C	730D009C	730D009C
Date Dumped	9/7/75	11/3/75	1/24/76	2/25/76
<u>Component</u>				
Sodium (Metal & Oxides)	65.4%	65.5%	67.0%	65.0%
Calcium (Metal & Oxides)	9.9%	9.4%	7.7%	10.3%
Oxygen (In Oxides)	4.8%	5.6%	5.8%	5.3%
Sodium & Calcium Chlorides	19.9%	19.5%	19.5%	19.4%
Cadmium	0.22 ppm	0.32 ppm	0.43 ppm	0.11 ppm
Mercury	<0.1 ppm	0.206 ppm	0.10 ppm	<0.10 ppm

EXHIBIT B

Paragraph 7a Quantity of Material Dumped

Trip No.	No. 4	No. 5	No. 6	No. 7
Permit No.	730D009C	730D009C	730D009C	730D009C
Date of Dumping	9/7/75	11/23/75	1/24/76	2/25/76
Number of Drums	550	700	700	696

Parts Per Million of Each Constituent

Sodium (in Metal & Oxides)	654,000 ppm	655,000 ppm	670,000 ppm	650,000 ppm
Calcium (in Metal & Oxides)	99,000 ppm	94,000 ppm	77,000 ppm	103,000 ppm
Sodium & Calcium Chlorides	199,000 ppm	195,000 ppm	195,000 ppm	194,000 ppm
Oxygen (in Oxides)	48,000 ppm	56,000 ppm	58,000 ppm	53,000 ppm
Cadmium	0.22 ppm	0.32 ppm	0.43 ppm	0.11 ppm
Mercury	< 0.1 ppm	0.206 ppm	0.1 ppm	< 0.10 ppm
Total	1,000,000	1,000,000	1,000,000	1,000,000

Pounds of Each Constituent

Sodium (in Metal & Oxides)	178,035 Lbs.	226,960 Lbs.	232,155 Lbs.	223,938 Lbs.
Calcium (in Metal & Oxides)	26,950 Lbs.	32,570 Lbs.	26,681 Lbs.	35,486 Lbs.
Sodium & Calcium Chlorides	54,173 Lbs.	67,570 Lbs.	67,567 Lbs.	66,838 Lbs.
Oxygen (in Oxides)	13,067 Lbs.	19,440 Lbs.	20,097 Lbs.	18,260 Lbs.
Cadmium	0.06 Lbs.	0.11 Lbs.	0.15 Lbs.	0.038 Lbs.
Mercury	0.003 Lbs.	0.07 Lbs.	0.003 Lbs.	< 0.003 Lbs.
Total	272,225	346,540	346,500	344,522

157311 Kg

150413 Kg

Continued Exhibit BParagraph 7b Time & Location of Barging & Dumping

Trip No.	No. 4	No. 5	No. 6	No. 7
Permit No.	730D009C	730D009C	730D009C	730D009C

Commenced Dumping

Date	9/7/75	11/23/75	1/24/76	2/25/76
Time	0700 hrs. CST	0700 Hrs. CST	0800 Hrs. CST	0910 Hrs. CST
North Latitude	28° 05 min.	28° 05 min.	28° 14 min.	28° 11 min.
West Longitude	89° 18 min.	89° 20 min.	89° 33 min.	89° 29 min.

Ceased Dumping

Date	9/7/75	11/23/75	1/24/76	2/25/76
Time	1000 Hrs. CST	1305 Hrs. CST	1410 Hrs. CST	1410 Hrs. CST
North Latitude	28° 04 min.	28° 05.5 min.	28° 7 min.	28° 07 min.
West Longitude	89° 24 min.	89° 22 min.	89° 26 min.	89° 28 min.
Midpoint when operation extended over six hours	Less than 6 hours	89° 17.5 min. W 28° 07.2 min. N	89° 23 min. W 28° 2 min. N	89° 24 min. W 28° 06 min. N

Paragraph 7c Departure & Return

Trip No. for Permit 730D009C	No. 4	No. 5	No. 6	No. 7
Date Departure from Baton Rouge	9/4/75	11/20/75	1/15/76	2/19/76
Time Departure	1700 hrs. CST	1730 hrs. CST	1650 hrs. CST	1600 hrs. CST
Date Returned Lockport	9/8/75	11/24/75	1/23/76	2/26/76
Time Returned	1100 hrs. CST	1930 hrs. CST	1100 hrs. CST	1020 hrs. CST